



June 20, 2016

Federal Communications Commission  
Mrs. Marlene Dortch, Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: Letter in response to RM-11681 Petition for Rulemaking: Ligado's Request to Allocate the 1675-1680 MHz band for Terrestrial Mobile Use Shared With Federal Use

Dear Ms. Dortch:

The Interstate Council on Water Policy (ICWP) is the national organization of state, interstate, regional and local water resources agencies - the nation's water managers. Within this context, I am writing to express concern that interruptions and frequency interferences that impact the collection, transmittal, real-time data accessibility and general functionality of the GOES Data Collection System (DCS) will be detrimental to non-federal agencies charged with water resources management, natural resource protection and public health and safety responsibilities.

As an example, the USGS National Streamflow Network (that contains approximately 8,100 streamgages), serves the federal, state, and local need. This vital network relies upon the continuous functionality of the GOES DCS and provides for an integrated monitoring network and proven source of reliable scientific information across a wide variety of water resource planning, design and operational functions, including:

- monitoring compliance with federal compact and Native American trust responsibilities;
- designing bridges, dams, levees, and other infrastructure;
- forecasting storm surge, flood and drought conditions and issuing emergency advisories;
- identifying flood-prone areas to protect lives and property and reduce disaster relief expenses;
- protecting water rights;
- managing reservoir releases for water supply, irrigation, hydropower, environmental and navigation uses;

- monitoring and protecting water quality, fisheries, wetlands and endangered species;
- providing safety information for boating and other water-based recreation;
- analyzing climate trends and evaluating community and regional response options; and
- projecting future water needs and availability for agricultural, municipal and industrial uses.

Significant and/or frequent interruptions to the collection and delivery of real-time information received/transmitted via the GOES and GOES-R satellites (1675 – 1680 MHz spectrum) will compromise the ability of State, Interstate and local agencies to perform the critical responsibilities outlined above.

Furthermore, the USGS National Streamflow Network operates on a budget of about \$170M; about 21% represents USGS funding for the federal-needs network; 14% is USGS cooperative matching funds; **45% is provided by States, Interstates, localities and tribes;** 12% is provided by the Army Corps of Engineers; 5% is by other federal agencies. In addition, many non-federal agencies operate independent monitoring networks (e.g. groundwater monitoring networks, water quality stations, etc.) that collect and serve real-time information through utilization of the GOES DCS (where GOES access is typically fully funded by the non-federal entity).

I urge the FCC to consider extending “protection zones” to state, interstate and local agencies as these entities have both the mandated responsibility and a significant cost-share commitment to ensure the public is served with accurate and timely water resources information. Such protection is crucial to avoid the disruption of vital information used to ensure the nation’s economic health and national safety and security interests are safeguarded.

I thank you for considering my input.

Sincerely,  
INTERSTATE COUNCIL ON WATER POLICY

A handwritten signature in black ink, appearing to read "Dru Buntin", written in a cursive style.

Dru Buntin, Chairman